



{In Archive} Re: Canton copper WER Final Report 
Diane Evans to: Michael Pfeil

09/07/2011 09:30 AM

From: Diane Evans/R6/USEPA/US
To: "Michael Pfeil" <Michael.Pfeil@tceq.texas.gov>,
Archive: This message is being viewed in an archive.

It was just a week plus Friday before and Labor Day. Yes - great trip to NH (in time for Irene) and in Boston for three days! I saw a Sox - Yankees game!

Yes - I was referring to capping the individual WERs at 10. I mentioned it to Debbie before my trip and she was generally OK with it. Yes, I agree if we were bumping up against the limit that the permittee needed, it would be better not to do this for individual WERs/.

I think in the original workplan, they had calculated a WER around 4 (?) would remove the limits. The 1994 WER guidance talks about not maxing out WERs if a lower value gets you what you need, but it doesn't really say how to do that. It could be difficult to make this determination, particularly where you were close to the value needed, and need to consider growth for future permits. But in this case, I think capping at 10 for individual studies is an easy compromise. If the lower geo-mean of the WERs results in a permit limit in the future, that probably means that the discharge has change A LOT and they need to re-do the WER.

I need to work on selenium for a few hours, but will probably look at part of it after lunch.

"Michael Pfeil"

Diane-

09/07/2011 09:06:53 AM

From: "Michael Pfeil" <Michael.Pfeil@tceq.texas.gov>
To: Diane Evans/R6/USEPA/US@EPA
Date: 09/07/2011 09:06 AM
Subject: Re: **Canton** copper WER Final Report

Diane-

I know that feeling about coming back from vacation. How long were you gone? Two weeks? Hope it was worth it!

When you say that the final WER value will likely change a little bit, were you referring to your earlier proposal about capping individual studies (as opposed to final WERs) at 10? If so, I think that sis something that needs to include Debbie, as she is on the standards team, where the final WER will ultimately be incorporated.

I sent them the value that was calculated since they were wanting to incorporate the WER into the permit that was already in-house, saving the trouble of coming in with a major amendment right after the permit was issued.

I have no strong feelings either way about capping the individual studies, unless by doing so the final WER would not provide the relief the permittee seeks, since there is nothing in the regulations about it and it could be seen as somewhat arbitrary to do so by the permittee seeking the relief the WER value would provide.

Mike

>>> On 9/7/2011 at 8:06 AM, <Evans.Diane@epamail.epa.gov> wrote:

Hi Larry,

Sorry I didn't get back with you yesterday - re-entry after vacation is tough!

Yes, you can say that the WER study is under review by the R6 WQS program. I mentioned it to Rudy M. yesterday when he came over to ask about another permit. I'm not sure what the timing of your letter is, but I'm hoping to review the WER study this week. (I was originally planning to train a new person, but found out that his wife is having a baby any day, so he will likely be out of the office soon).

It's likely that the final WER value will change a little bit (still to be discussed with Mike, after I review the report).

I'm not sure if I've answered your questions, but am in the office all week.

Diane

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